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Waste Quality Protocols Review – Anaerobic Digestion Quality Protocol, Compost Quality Protocol, Poultry Litter Ash Quality Protocol - Call for evidence

The NFU represents 55,000 members in England and Wales, involved in 46,000 farming businesses. In addition, we have 55,000 countryside members with an interest in farming and the countryside. We welcome the opportunity to respond to this Environment Agency call for evidence.

Our interest in the call for evidence is as follows:-

- Many of our members receive compost, digestate and poultry litter ash as landspreading materials. Some NFU members are anaerobic digestion (AD) plant operators and composters, and some poultry producers use poultry litter in biomass boilers to create renewable energy. The Quality Protocols (QPs) are important from both the plant operator's perspective and the user of the resulting material.
- QPs are valuable in providing assurance and clarity to farmers that the materials being spread to land are of good agronomic benefit, high quality and safe for the environment.
- The NFU believe that QP's are widely recognised frameworks which work well to produce high quality products from waste materials, without being burdensome. They promote greater recovery and recycling, so any reversion would be a retrograde step and perverse to Defra's waste objectives.
- Any adverse changes or removal of the QPs must not stifle the future growth of the on-farm AD sector, compost sector and markets for poultry litter ash.
- The NFU believe more should be done to eliminate plastic contamination in materials spread to land, this would improve market confidence in the agricultural sector and embrace circular waste economy.

Please be aware that we are only going to respond to questions relevant to our organisation and our members.

- **Issues of clarity - Is the text of the QP clear?**

Somewhat agree. The NFU agrees with the overall principle that Quality Protocols (QP's) based upon easily-understood and risk-based rules help to reduce the administrative burden on businesses while maintaining environmental standards.

The text could be refined to remove any ambiguity and ease AD processing on farm. As the biowaste industry has grown and technologies have advanced, specifically in AD sector, the guidance needs to be updated to reflect these changes. E.g. clarity on types of digestate and whether enhancement treatments are within the scope of the QP.

To assist farmers in nutrient management planning, the NFU believe that text regarding nitrogen efficiency in QP's should reflect that within the AHDB's Nutrient Management Guide (RB209). This would eliminate some of the ambiguity when farmers and land managers are developing nutrient management plans.

Clarity should be aided by the ongoing development of waste checking tools.

- **Any abuse of the QP that you are aware of - Please specify what the abuse is and if possible provide evidence.**

NFU members have raised concerns over plastic contamination in food waste and garden waste derived compost and digestate material. Whilst there are specified limits within the QP, there is a growing concern that these limits are not always enforced. The NFU would like to see operators taking more responsibility to adhere to the limits stated in the QP's.

- **Are there any aspects of the QP that you find onerous to meet and why?**
No response
- **Are there any aspects of the QPs that you find too lenient and why?**
No response
- **As it stands, do you think that even if the QP is followed it nevertheless creates a risk to the environment and/or human health, if so why? Can you provide any evidence?**
No response
- **Are there developing or new waste processing technologies that could be included in the QP? These could be newly emerging technologies which have developed after the QP was published, or pre-existing technologies that were not included in the original QP design. Please provide evidence of their efficacy.**

Yes. Specifically, in the AD sector there are emerging technologies. The NFU would not want changes to compromise the reputation of the Anaerobic Digestate Quality Protocol (ADQP) standard. As we do not have the expertise in-house we would also be interested to know who else responds to the consultation and whether they have considered the agricultural impact in their response.

- **In relation to the QP are there any uses and/or new end product markets that have developed since original publication which could be added now?**
No response
- **In relation to the QP has there been any revision of or developments relating to the product standards set out in the QP relevant to the use(s)? Have there been any new product standards published since original publication of the QP which you believe should be included?**
No response

- **Are there any other relevant issues you wish to raise in relation to the QP? At this point no decision has been made as to whether we will continue or withdraw our support for these QPs. We would like your input so we can take this into account when we make that decision.**

As already stated, multiple NFU members have raised concerns over plastic contamination in digestate and compost, in excess of the QP limit.

The NFU fully supports investment in technologies which will help reduce the level of plastic contamination. It is important that plastic waste sorting and recycling technologies keep pace with new materials, to avoid problems with contamination of recovered feedstocks. Processors need assistance from government to install solutions where they can reduce the contamination status of digestate and compost as part of a UK approach.

The NFU feels there is more to be done in term of informing and educating businesses and households who contribute to these waste streams in order to help reduce and eventually eliminated plastic contamination in household collections of green waste.

Failure to tackle the issue of plastic contamination in digestate and compost products spread to land will be detrimental to market confidence and perverse to achieving governments circular economy objectives. This is a key concern for the agriculture sector, and we are aware that some retailers and food agencies are already withdrawing support for digestate and compost spreading to agricultural land.

- **As well as the responses to the above questions, we would appreciate your views on the QP specific issues previously raised by Environment Agency staff below. Any evidence you can provide to support your views would also be welcomed.**

No response

Anaerobic Digestion Quality Protocol:

- **Do you think there is a market for the digestate that meets the QP requirements and if so what is it?**

Yes - when the QP requirements are adhered to, digestate is a valuable fertiliser for the agricultural sector.

- **Do you think that QP compliant digestate has more potential to pollute than the comparator substance (i.e. pig slurry) and why? Do you think the QP compliant product is as stable in storage as that of the non-waste comparator?**

The NFU believes that digestate and ammonia rich feedstocks should follow the same standards as silage and slurry (SSAFO regulations) as they potentially pose the same risk to the environment. However, the NFU believes that special consideration needs to be given to the smaller (< 80kW) AD operators which are often part of a farm business. Many of these smaller plants provide multiple benefits such as converting food waste and manure into a valuable energy resource for neighbouring communities and provide a significantly lower source of income compared to larger sites. These smaller systems should be encouraged as the multiple benefits will likely outweigh the minimal ammonia emissions emitted from the store. Careful consideration must be taken to ensure that added regulation does not hinder growth of these types of progressive technologies.

Compost Quality Protocol:

- **Do you think that QP compliant compost contains the same contaminants e.g. plastic, organic contaminants including POPs (Persistent Organic Pollutants), as equivalent non-waste manufactured fertilisers? If so, why?**

No. There is more market confidence in the quality of non-waste manufactured fertiliser due to lack of contaminants. The contaminants listed above will hinder the market for compost in the agricultural sector. This should be avoided at all costs.

Poultry Litter Ash Quality Protocol:

- **Does the lack of a specification for the end use affect the market for this material?**

No. Poultry litter ash is a valuable fertiliser for the agricultural sector, containing many nutrients beneficial to crops. When compared to poultry manure, it is low in nitrogen, meaning there is a market for use within Nitrate Vulnerable Zones (NVZ's).

On-farm processors generally agree that there is an adequate specification within the Poultry Litter Ash Quality Protocol (PLAQP).

- **Are you a new PLA producer or a new PLA producer who was not involved in the design of the original QP e.g. on farm producers? If so, how are they/you using the QP?**
No response